

Exhibit B

From: [John Davis](#)
To: [Goldberg, Seth A.](#)
Cc: [Ruben Honik](#); [Conlee Whiteley](#); ["Adam Slater"](#); [Daniel Nigh](#); [David J. Stanoch](#); [Layne Hilton](#)
Subject: Additional Econ Loss Reps- Deposition Availability
Date: Monday, December 21, 2020 8:47:09 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[2020.12.21 Depo Availability Econ Loss Reps.docx](#)

Seth,

We had held off providing deposition availability and producing Rule 34 documents for the proposed new economic loss class representatives in light of your side reaching out on Dec. 14 to potentially negotiate a larger modification to the schedule that would encompass this.

It's clear from what we heard on tonight's call that there is still some daylight between the respective scheduling positions. In light of that reality, we are providing deposition availability within the current deadlines for the proposed new reps in late February through March 26. Please see the redlines in the attached word document.

We will be providing Rule 34 responsive documents after the holiday as those take some administrative leg work to get bates stamped and uploaded to centrality. We are happy to provide informally those documents as soon as tomorrow or Weds, if you wish. Let us know. PFSs will follow.

In the event the parties agree to an omnibus scheduling amendment that includes these depositions at a later time, and the Court grants the parties' joint request to amend the schedule, we will of course provide new deposition dates that comports with the parties' agreement.

Thanks,



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VALSARTAN
Economic Loss Class
Deposition Dates

	Plaintiff	Defense Firm	Dates Proposed by Plaintiffs	Defendants' Response
1	Borkowski	Cipriani & Werner	February 3, 4, or 5	February 4
2	Erwin	GT	January 19, 20, or 21	January 19
3	Hamel	Cipriani & Werner	January 26 or 27	January 27
4	Kaplan	Cipriani & Werner	January 19, 20, 21, or 22	January 22
5	Longwell	Hill Wallack	January 21, 22, or 26	January 26
6	Molinaro	Duane Morris	February 3, 4, 5, 9 or 10	February 10
7	Neal	Duane Morris	January 26, 27, 28, or 29	January 29
8	Roberts	GT	February 2, 3, 4, or 5	February 2
9	Semmel	Hill Wallack	January 28 or 29, or February 1 or 2	February 2
10	Nelson	GT	January 18-22	January 21 or 22
11	Byrd	Cipriani & Werner	February 1-2, 8-9, 15-16, or 22-23	February 16
12	Gildner	Hill Wallack	January 21-22, February 2-5, or February 15-19	February 4
13	Lee	Kirkland & Ellis, LLP	February 22-25, March 1-5, or March 8-10	March 2 or 3
14	Duffy	Duane Morris	February 9-12, or 16-18	February 9
15	Mullins	Duane Morris	January 25-26, February 1-2, February 9, February	February 23

			15-16, or February 22-23	
	Plaintiff	Defense Firm	Dates Proposed by Plaintiffs	Defendants' Response
16	Powell	Kirkland & Ellis, LLP	January 20-21, January 27-29, February 2-5, or February 22-26	February 24
17	Wineinger	Duane Morris	January 25-26, February 1-2, February 8- 9, February 15-16, February 22-23, March 1-2, or March 8-9	March 2
18	Burnett	Duane Morris	February 3-4, February 9-12, or February 16-19	February 19
19	McGilvery	Duane Morris	January 26-29, February 1-4, February 9-11, February 16-19, or February 23-26	February 11
20	Cacaccio	Pietragallo	February 3, February 9-12, February 15-19, or March 2-5	February 9
21	Bruner	Cipriani & Werner	February 1-5, February 10-12, or February 22-25	February 25
22	O'Neill	Cipriani & Werner	February 15-19, February 23-25, or March 2-5	March 5
23	Daring	Pietragallo		February 16
24	R Tasker	Pietragallo		February 18

25	J Tasker	Pietragallo		February 19
26	Silberman	Hill Wallack		March 15
27	Zehr	Hill Wallack		March 24
28	MADA		February 24, March 10	
29	MSP		Week of January 28 Week of February 8 Week of March 22	
30	Nass		March 1-5	
31	Childs		March 1-5	
32	Glab		March 8-12	
33	Kelly		March 8-12	
34	Shetty		March 8-12	
35	Sims		March 8-12	
36	Wolfe		March 8-12	
37	Fatigato		March 15-19	
38	McLean		March 15-19	
39	Edwards		March 15-19	
40	Feijoo (Deutenberg)		March 15-19	
41	Cisneros		March 22-26	
42	Crocker		March 22-26	
43	Johnson		Feb. 22-26	
44	Lamy		Feb. 22-26	
45	Meader		Feb. 22-26	
46	Means		Feb. 22-26	
47	Anderson		March 22-26	
48	Lawson		March 22-26	